

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DISTRICT**

**IN RE: 18-SW-00016-SWH (MJW)**

**Filed Under Seal**

**GOVERNMENT'S SECOND REQUEST FOR EXTENSION  
OF THE NONDISCLOSURE ORDER COMMANDING YOUTUBE USER ACCOUNT  
AND CHANNELS, A SUBSIDIARY OF GOOGLE, INC.  
TO NOT NOTIFY ANY PERSON OF THE EXISTENCE OF  
SEARCH WARRANT 18-SW-00016-SWH (MJW)**

The United States requests that the Court order YouTube User Account and Channels, a subsidiary of Google, Inc. not to notify any person (including subscribers and customers of the account(s) listed in the Western District of Missouri search warrant 18-SW-00016-SWH (MJW)) of the existence of the search warrant for an additional 90-day period from the date of this order.

This Court issued an initial order on January 17, 2018, and an extension order on July 24, 2018, pursuant to 18 U.S.C. § 2705(b), directing YouTube User Account and Channels, a subsidiary of Google, Inc. not to disclose the existence of search warrant 18-SW-00016-SWH (MJW), or the Order of the Court, to the listed subscriber or to any other persons.

An extension of the nondisclosure order would be appropriate because the investigation is ongoing and there is reason to believe that notification of the existence of search warrant 18-SW-00016-SWH (MJW), will seriously jeopardize the investigation, including by endangering the life or physical safety of an individual, giving targets an opportunity to flee or continue flight from prosecution, to destroy or tamper with evidence, or to intimidate potential witnesses. *See* 18 U.S.C. § 2705(b).

WHEREFORE, the United States respectfully requests the Court grant the attached order directing YouTube User Account and Channels, a subsidiary of Google, Inc. not to disclose the existence or content of 18-SW-00016-SWH (MJW), except that YouTube User Account and

Channels, a subsidiary of Google, Inc. may disclose the search warrant to an attorney for YouTube User Account and Channels, a subsidiary of Google, Inc. for the purpose of receiving legal advice, for an additional period of 90 days.

The United States further requests the Court order that this application and any resulting order be sealed until further notice of the Court. As explained above, these documents discuss an ongoing criminal investigation. Accordingly, there is good cause to seal these documents because their premature disclosure may seriously jeopardize the investigation.

Executed on 10/17/18.



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Bruce Rhoades  
Assistant United States Attorney